

# **EXHIBIT 5**

**In the Matter Of:**

*Henry v*

*Brown Univeristy*

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*JOHN DEGIOIA, PH.D.*

*February 16, 2024*

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1 JOHN J. DeGIOIA, Ph.D. | 02.16.24  
2 to pay would be and that served then as the  
3 basis for our full-need financial aid policy,  
4 but each school was free to do whatever they  
5 wanted to do when they went back to their  
6 campuses and --

7 Q. What does -- I'm asking what  
8 specific words mean.

9 A. Okay.

10 Q. Okay? So you say a consensus is a  
11 shared understanding. When you say "a shared  
12 understanding," you mean like a meeting of the  
13 minds? I mean, what is a shared  
14 understanding?

15 A. Well, again, I was placing it in  
16 distinction to the term that you added, which  
17 was "agreement," and there was no formal  
18 agreement that any member of the 568 Group  
19 would follow the common methodology, that  
20 consensus methodology. There was no agreement  
21 that anybody would actually follow what was  
22 developed. It was developed in the context of  
23 some outstanding practitioners bringing the  
24 best practices to bear in developing a  
25 methodology that would then be available to

1                   JOHN J. DeGIOIA, Ph.D. | 02.16.24

2   any campus as they chose to use the policy.

3   And it was intended to reflect that this is

4   the judgment -- this is a shared understanding

5   among a group of professionals that these --

6   this approach to assessing a family's ability

7   to pay was developed by a group of colleagues

8   working together, but then each school was

9   free to go back to their place and do whatever

10   they deemed appropriate. We just all had to

11   be need-blind.

12           Q.     All right. Why did Yale leave the

13   568 Group around 2008?

14           A.     I don't know.

15           Q.     Did you ever ask anyone at Yale why

16   they left?

17           A.     I don't recall asking anyone.

18           Q.     Did anyone at Yale ever send you a

19   letter explaining they were leaving?

20           A.     It would not -- when I was chair,

21   so if it was the time when I was chair, it

22   would not be unusual that if a school is

23   leaving, they would send me a formal letter.

24           ATTORNEY GILBERT: Tab 52 is going to

25   be the next exhibit.